

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**KONINKLIJKE PHILIPS ELECTRONICS
N.V. and U.S. PHILIPS CORPORATION,**

Plaintiffs,

v.

CINRAM INTERNATIONAL INC., et al.

THE ADS GROUP, et al.

**ENTERTAINMENT DISTRIBUTION
COMPANY (USA) LLC, et al.**

**OPTICAL EXPERTS MANUFACTURING
INC., et al.**

Defendants.

Civil Action Nos.

08 CV 00515 (RGS)

08 CV 04068 (RGS)

08 CV 04070 (RGS)

08 CV 04071 (RGS)

ECF Cases

**NOTICE OF PHILIPS' MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINTS**

NOTICE IS HEREBY GIVEN that on a date set by the Honorable Richard G. Stearns of the above-referenced Court, sitting by designation, Plaintiffs Koninklijke Philips Electronics N.V. and U.S. Philips Corporation (collectively, "Philips") will and hereby does move for an Order pursuant to Fed. R. Civ. P. 15(a) granting Philips leave to file the Second Amended Complaints attached as exhibits to the accompanying Memorandum of Law.

This motion is based upon this Notice of Motion, the accompanying Memorandum of Law, and on such additional arguments and evidence as may be presented to the Court at or prior to the hearing on this motion.

Date: March 30, 2010

/s/ Samuel C. Bass

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John F. Hornick (*pro hac vice*)

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U.S. Philips Corporation

CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2010, a copy of the foregoing **NOTICE OF PHILIPS' MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINTS** was served by email on the following attorneys for Defendants, addressed as follows:

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